

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

JESSE BRINTLEY

Case No.

17-1633-M-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2017 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Title 18, USC, 1951
Title 18, USC, 924(c)
Title 18, USC, 2

Offense Description

Robbery that Interferes with Interstate Commerce
Use/Possession of a Firearm in Furtherance of a Crime of Violence
Aiding and Abetting

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

Richard Antonini, ATF TFO

Printed name and title

Sworn to before me and signed in my presence.

Date: December 11, 2017

City and state: Philadelphia, PA



Judge's signature

Hon. Lynne A. Sitarski, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
for the

Eastern District of Pennsylvania

United States of America)

v.)

JEFFREY MCDONALD)

Case No.

17-1633-M-2

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2017 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Title 18, USC, 1951
Title 18, USC, 924(c)
Title 18, USC, 2

Offense Description

Robbery that Interferes with Interstate Commerce
Use/Possession of a Firearm in Furtherance of a Crime of Violence
Aiding and Abetting

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

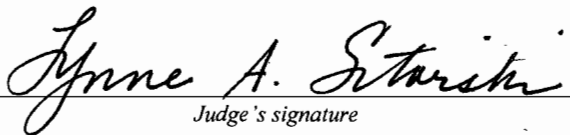
Richard Antonini, ATF TFO

Printed name and title

Sworn to before me and signed in my presence.

Date: December 11, 2017

City and state: Philadelphia, PA



Judge's signature

Hon. Lynne A. Sitariski, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America

v.

SCOTT BROOKS
a/k/a Rasheed Brooks

Case No.

17-1633-M-3

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2017 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Title 18, USC, 1951
Title 18, USC, 924(c)
Title 18, USC, 2

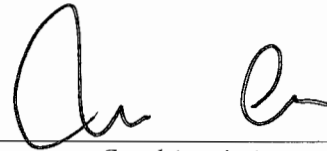
Offense Description

Robbery that Interferes with Interstate Commerce
Use/Possession of a Firearm in Furtherance of a Crime of Violence
Aiding and Abetting

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

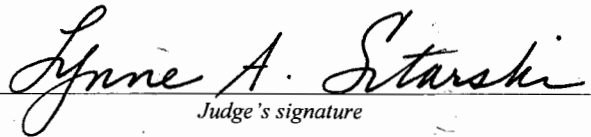
Richard Antonini, ATF TFO

Printed name and title

Sworn to before me and signed in my presence.

Date: December 11, 2017

City and state: Philadelphia, PA



Judge's signature

Hon. Lynne A. Sitariski, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Richard Antonini, Task Force Officer, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being duly sworn, state as follows:

1. I am a Philadelphia Police Detective (hereinafter referred to as PPD) currently assigned to serve as a Task Force Officer (TFO) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). As a TFO, I work with ATF Violent Crimes Task Force, which investigates violations of federal offenses to include Hobbs Act Robbery, firearms, and illegal distribution of narcotics. I have been a police officer with the Philadelphia Police Dept since 1999, when I successfully completed the Philadelphia Police Department Police Academy. Prior to my current assignment, I was a Detective in a specialized unit with Southwest Detective Division (SIU) where my responsibilities included violent crimes such as armed robberies, attempted homicides, firearms offenses, and assaults. In my experience with the Philadelphia Police Department and ATF, I have personally conducted and assisted in several investigations involving violations of these laws.

2. This affidavit is submitted in support of criminal complaints and warrants for Scott BROOKS a/k/a Rasheed Brooks, Jeffrey MCDONALD, and Jesse BRINTLEY for violations of Title 18, United States Code, Sections 1951 (robbery which interferes with interstate commerce), 924 (c) (use of a firearm in furtherance of a crime of violence), and 2 (aiding and abetting).

3. I obtained the information contained in this affidavit through my investigation and through the information relayed to me by fellow agents, Philadelphia Police Department (PPD) detectives, and police officers. Because I am submitting this affidavit for the limited purpose of securing arrest warrants for Scott BROOKS a/k/a Rasheed Brooks, Jeffrey MCDONALD, and

Jesse BRINTLEY, I have not included every fact known to me concerning this investigation, but have rather set forth only facts necessary to establish probable cause.

4. On September 3, 2017, at approximately 1:47 p.m., members of the Philadelphia Police Department responded to a report of an armed robbery in progress at Hopkins Pharmacy located at 7700 Ridge Avenue in Philadelphia, Pennsylvania. Hopkins Pharmacy is a retail pharmacy engaged in and affecting interstate commerce, selling to retail customers in Pennsylvania prescription medications and other products manufactured and transported from outside Pennsylvania. The pharmacy employees advised responding officers that three men came into the store, pointed a firearm at the pharmacy employees, ordered the two pharmacy technicians, A.F. and M.B, to the floor and demanded Oxycodone and Percocet pills. The unmasked, armed robbers held victim, M.G., the pharmacist, at gunpoint as they filled their bags with pills they stole from the cabinet containing the narcotics. M.G. reported that the three men stole approximately 600 pills.

5. A witness, T.L., who was traveling in his car near the Hopkins Pharmacy observed all three robbers as they fled the pharmacy after the robbery. The witness followed the three and watch as they got into a black SUV and sped away from the area. The witness followed them and recorded the number from the license plate as GMY-2215. The witness followed the car for several blocks and then returned to the Hopkins Pharmacy where he relayed the information. A check with the Pennsylvania Department of Transportation (PENNDOT) confirmed that the license plate matches that of a 2014 Dodge Journey registered by Marlene Brooks of 2731 Lardner Street, Philadelphia, Pennsylvania.¹

6. Officers who responded to the robbery at Hopkins Pharmacy broadcasted

¹ I confirmed that Marlene Brooks, the mother of Scott BROOKS, owns the Dodge Journey and allowed Brooks to use it on September 3, 2017 during the time the robbery occurred.

information about the crime and the car over police radio to surrounding police districts.

Officers on patrol in the 22nd District observed the black Dodge Journey with license plate GMY-2215 near Ridge Avenue and 22nd Street. When the officers attempted to stop the car, the driver sped away. After a few blocks, PPD decided to terminate the pursuit for safety reasons.

7. Immediately thereafter, while checking surrounding areas, other officers observed the Dodge Journey abandoned with its engine running. Officers identified the license plate number on Dodge Journey as the number reported by the witness, GMY-2215. Officers located Rasheed BROOKS in an alley close to where the car was left.

8. Officers brought victim A.F. from the pharmacy to where they found BROOKS. A.F. identified BROOKS as one of the men who robbed the pharmacy. The officers who initiated the car pursuit also identified BROOKS as the driver of the Dodge Journey.

9. Detectives searched the Dodge Journey pursuant to a search warrant. Detectives recovered the following: six bottles of OxyContin and one bottle of Roxicodone pills with "Hopkins" stamped on the labels, a purple hooded sweatshirt with a NIKE swoosh symbol, white and black camouflage zipper sweatshirt, and a Pennsylvania identification card for Jesse BRINTLEY. The distinctive black/white sweatshirt appears the same as the sweatshirt worn by one of the robbers, shown clearly in the surveillance video obtained from the pharmacy.

10. On September 4, 2017, M.G. identified Jeffrey MCDONALD and A.F. identified Jesse BRINTLEY, as participants in the robbery, from sequential photo arrays they viewed.²

11. As part of their investigation, detectives recovered surveillance videos from Hopkins Pharmacy, as well as other businesses and homeowners near the pharmacy. One of the videos shows the same three men, wearing the same clothing as worn in the robbery, at a

² M.B. was unable to identify MCDONALD and/or BRINTLEY after viewing the photos.

location in close proximity to the pharmacy immediately before the robbery.

The videos show each male walking on Ridge Avenue, while observing their surroundings, in close proximity to Hopkins Pharmacy. The video obtained from Hopkins Pharmacy clearly establishes the following: three males entered the store; one brandished a firearm, the same robber held the gun on the pharmacist as he directed him to the narcotics cabinet; two participated in stealing things from behind the counter as the third man pulled wires out from systems connected behind the counter; and the three men left together with bags of stolen items they took from behind the counter in the pharmacy.

12. On September 3, 2017, after police officers arrested BROOKS, he waived his *Miranda* rights and provided detectives with a statement that the detectives recorded. BROOKS denied his involvement in the robbery and claimed, among other things, that he loaned his mother's car to someone during the time of the robbery and that person was dressed in the same clothing that BROOKS wore that day. BROOKS explained that he fled from the police because his mother told him the police suspected his involvement in a robbery, and the police drew their weapons on him when they initially approached his car.

13. On September 5, 2017, PPD detectives searched 2945 N. Judson Street, MCDONALD's residence, pursuant to a search warrant, and recovered \$4465.00 cash along with drug paraphernalia. Detectives also searched 4622 Ella Street, BRINTLEY's residence, but did not find anything related to the investigation.

14. I know from my investigation that BROOKS, BRINTLEY, and MCDONALD have been together prior to the robbery. PPD records revealed that on August 16, 2017, BROOKS, BRINTLEY, and MCDONALD were travelling together in Marlene BROOKS' Dodge Journey when officers pulled them over for a traffic investigation.

15. On September 6, 2017, detectives obtained arrest warrants for BRINTLEY and MCDONALD for the robbery of Hopkins Pharmacy and related offenses. In October 2017, they were located and arrested.

16. On November 7, 2017, I obtained additional surveillance footage from victim M.G. that he recovered from Roxy Gas Station located at Ridge and Shawmont Avenues, less than one block from the Hopkins Pharmacy. The video clearly shows two of the men that committed the robbery in the same clothing they are wearing in the robbery, approximately 17 minutes prior to the robbery. Based on my review and comparison of the videos to photographs I obtained of MCDONALD and BROOKS, I believe the male wearing the red pants is MCDONALD and the male wearing the dark colored hooded sweatshirt and ball cap is BROOKS.

17. On November 8, 2017, victim M.G. identified Jeffrey McDONALD in a line-up conducted at MCDONALD's request by the Philadelphia Police Department. On the same date, victim A.F. identified Jesse BRINTLEY in a line-up conducted at BRINTLEY's request by the Philadelphia Police Department.

18. On December 7, 2017, Marlene Brooks, Scott BROOKS' mother, viewed a screen shot of the Roxy gas station video and identified the man in the dark colored hooded sweatshirt as her son, Scott BROOKS.

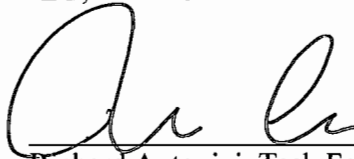
19. I obtained and reviewed body worn camera (BWC) video footage from all PPD officers that assisted in pursuing and attempting to stop the Dodge Journey after the robbery. The BWC video recording shows the black Dodge Journey flee from police at a high rate of speed engaging the police in a high-speed pursuit. When officers arrested BROOKS, he was wearing distinctive sneakers, which appear similar to those worn by one of the robbers shown in the

pharmacy video. When interviewed by detectives BROOKS described his shoes as Nike "foamposites," and claimed everyone in the neighborhood had them.

20. I have consulted with an ATF expert in narcotics trafficking and based review of the inventory of stolen pills from Hopkins Pharmacy and the current trends in narcotics sales, he concluded that the approximate value of the pills stolen, if sold illegally would be approximately \$150,000.

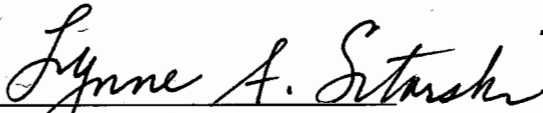
Conclusion

21. I submit there is probable cause to believe Scott BROOKS a/k/a Rasheed Brooks, Jesse BRINTLEY, and Jeffery MCDONALD, have violated Title 18, United States Code, Sections 1951 (robbery which interferes with interstate commerce), 924(c) (use of a firearm in furtherance of a crime of violence), and 2 (aiding and abetting). As such, I request that this Court issue a warrant for BROOKS, BRINTLEY, and MCDONALD.



Richard Antonini, Task Force Officer
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to and subscribed
before me this 11th
day of December 2017



Honorable Lynne A. Sitarski
United States Magistrate Judge